

EXHIBIT 2

(To Be Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Case No. 17-CV-05507 (AKH)

CLAUDINNE FELICIANO,
Individually and on behalf of
all others similarly situated,

Plaintiff,

-against-

CORELOGIC SAFERENT, LLC
a/k/a CORELOGIC RENTAL PROPERTY
SOLUTIONS, LLC,

Defendant.

_____/

Veritext
37 North Orange Avenue
Suite 500
Orlando, Florida
9:47 a.m. - 3:46 p.m.
November 30, 2018

DEPOSITION OF AUTUMN DELOATCHE

Taken on behalf of the Plaintiff before Nancy N.
Foresteire, RPR, RMR, Notary Public in and for the State
of Florida at Large, pursuant to Notice of Taking
Deposition in the above cause.

1 A Yes.

2 Q And that was in 2011?

3 A Yes.

4 Q Do you remember what month?

5 A March.

6 Q And when you transferred back to Ocala in
7 March of '11, what was your title?

8 A I don't recall.

9 Q What were your duties then?

10 A Criminal and civil research.

11 Q And I believe you testified earlier that
12 civil and criminal research involved performing searches
13 and researching requests for background checks by
14 computer, correct, when you say that your duties were
15 criminal and civil research. Is that what it consisted
16 of?

17 A Yes.

18 Q Anything else?

19 A Yes.

20 Q What?

21 A I helped train researchers.

22 Q When did you start doing that?

23 A 2011.

24 Q That's when you returned to the Ocala office?

25 A Yes.

1 purchase these reports?

2 A I do not know.

3 Q How many courts does Corelogic obtain this
4 information from?

5 A I do not know.

6 Q Is there any record or document that would
7 tell you that?

8 A I don't know.

9 Q Well, you testified earlier that you were
10 involved in physically going to courts, right, around
11 the country and training people at those courts,
12 correct?

13 A Yes.

14 Q How many such courts did you visit?

15 A I do not know.

16 Q Well, more than five?

17 A Yes.

18 Q More than ten?

19 A Yes.

20 Q More than 50?

21 A No.

22 Q So less than 50, more than ten?

23 A Yes.

24 Q More than 25?

25 A I don't know.

1 Q Now, when you were traveling to these various
2 courts and training researchers, was it just for housing
3 records or criminal or both?

4 A Both.

5 Q Now did you ever go to any courts located in
6 the State of New York during that period?

7 A Yes.

8 Q When?

9 A Don't recall.

10 Q Where in New York did you go?

11 A Various courts.

12 Q Well, be specific, please.

13 A Courthouse in White Plains, New York, Bronx,
14 Manhattan, Harlem Justice, Kings, Queens, Staten Island,
15 Ronkonkoma.

16 Q I believe it's R-O-N-K-O-N-K-A-N-A.

17 MR. ST. GEORGE: Your guess is as good as
18 mine.

19 BY MR. FISHMAN:

20 Q I have seen the name. Any other places in
21 New York, besides those? Any other courts or locations
22 in the State of New York?

23 A Not that I recall.

24 Q So did you go to every -- well, backing up.
25 My questions are now specifically related to traveling

1 Q Was it more than once?

2 A Yes.

3 Q Was it more than five?

4 A For training purposes only?

5 Q Well, let me rephrase it. How many times did
6 you travel to New York for the purpose of data
7 acquisition of housing records?

8 A I don't know.

9 Q Whether it's training or something else?

10 A I don't know.

11 Q Or any purpose? Okay. Is it more than five?

12 A Yes.

13 Q Is it more than ten?

14 A Yes.

15 Q More than 15?

16 A Yes.

17 Q So you went there a lot?

18 A Yes.

19 Q To New York?

20 A Yes.

21 Q And when you went to New York, did you go to
22 all those courthouses that you gave me before or just
23 some of them or something else?

24 A Can you clarify?

25 Q Well, you gave me a list of courthouses

1 before, White Plains, Bronx, Manhattan, Harlem Justice,
2 Kings, Queens, Staten Island, Ronkonkoma?

3 A Yes.

4 Q That's the total universe of courthouses in
5 New York you've been to; is that right, in connection
6 with your work?

7 A Yes.

8 Q And when you went each time, did you go to
9 every one of them on that list or somewhere other than
10 that?

11 A I did not visit each courthouse every time I
12 went to New York.

13 Q And every time you went to New York, was it
14 for the same purpose?

15 MR. ST. GEORGE: Object to form.

16 THE WITNESS: Can you clarify?

17 BY MR. FISHMAN:

18 Q Well, one of the purposes of going to New
19 York was to train researchers, right?

20 A Correct.

21 Q What other purposes did you go to New York
22 for?

23 A Collection of data.

24 Q Collection by you?

25 A Yes.

1 A I don't recall.

2 Q And what researchers did you train?

3 A You want their names?

4 Q Sure.

5 A Sylvia Flores.

6 Q Hold on. Sylvia F-L-O-R-E-S?

7 A I believe so.

8 Q Okay.

9 A Eric Steinfeld.

10 Q S-T-E-I-N-F-E-L-D? A "T" on the end, maybe?

11 A No, it is a D on the end.

12 Q Okay.

13 A Bhava Lad.

14 Q How do you spell the first name?

15 A I don't recall. I know it's B-H.

16 Q B-H. Okay. Maybe it's Bhava. We'll

17 phonetically do it. Bhava. What's the last name?

18 A Lad, L-A-D.

19 Q L-A-D. Anybody else?

20 A Borys Joza.

21 Q Boris, B-O-R-I-S?

22 A Oh, B-O-R-Y-S. Joza. J-O-Z-A.

23 Q Okay.

24 A I don't recall the names of the others I

25 trained.

1 Q How many others were there, besides those
2 four?

3 A I don't know.

4 Q A lot of others?

5 A No.

6 Q Or just a handful?

7 A Just a handful.

8 Q What, maybe two or three more?

9 A I don't know the exact number.

10 Q And prior to going to New York to train these
11 people -- because that's what you did, correct.

12 A Yes.

13 Q You went to New York to train them. Did they
14 go with you to New York or were they already in New
15 York?

16 A They were already located in New York.

17 Q So were they New York residents?

18 A To my knowledge.

19 Q And were they employees of Corelogic?

20 A Yes.

21 Q What was their title?

22 A I don't recall.

23 Q Were they researchers?

24 A Yes.

25 Q Is that their title?

1 A Hotel lobbies or Starbucks.

2 Q Okay. So you would meet one or more of these
3 researchers at a hotel lobby or a Starbucks for the
4 first day of training?

5 A Yes.

6 Q And how many people participated in those
7 trainings at a time?

8 A Usually one.

9 Q So you would meet with them one at a time?

10 A Yes.

11 Q And how long did those sessions last?

12 A It varied.

13 Q From what to what?

14 A Five to eight hours.

15 Q And what did the training consist of?

16 A The first day?

17 Q Yeah.

18 A We would go over the researcher manual, the
19 process and expectations of their job.

20 Q And prior to you training these people in
21 what you just described, in the first day of training,
22 were they previously working as researchers for
23 Corelogic or is this the first time they were working
24 for Corelogic as a researcher?

25 A Some of them were already Corelogic

1 locations?

2 A I was trained how to look up housing records
3 in the public access terminals.

4 Q And any particular records?

5 A Housing.

6 Q Well, any particular housing records?

7 MR. ST. GEORGE: Object to form.

8 THE WITNESS: I don't know.

9 BY MR. FISHMAN:

10 Q Well, walk me through the process when you're
11 sitting at the terminal. How do you access the
12 information you're looking for? What do you do?

13 A I don't recall the exact process.

14 Q Well, are you searching for a specific case
15 or random case or something else?

16 A We'd search by file date.

17 Q Okay. And tell me what that means.

18 A We would search by the date the initial
19 complaint was filed within the court.

20 Q So would it be fair to say, then, that when
21 you start with a particular date, you would look at the
22 index numbers of the cases filed on that date?

23 A Yes.

24 Q And they're issued sequentially, correct?

25 A To my knowledge.

1 Q So walk me through the process. You've got
2 the list in front of you. What did you do next?

3 A I would look at the detail, open and look at
4 the details of each case.

5 Q And how do you do that?

6 A I don't recall.

7 Q Well, is there a certain button on the screen
8 that you would click on to get to another screen?

9 A I don't recall.

10 Q Well, you said you opened the detail. What
11 does that mean?

12 A I don't recall if I double clicked or there
13 was a button.

14 Q But you were able to go directly from the
15 list to the detail, correct?

16 A Yes.

17 Q And then what did you see when you opened up
18 the detail, what kind of information?

19 A Party information, case type, file
20 information, disposition information.

21 Q Patient information, case type, what else?

22 A Disposition.

23 Q Anything else?

24 A File date.

25 Q Wasn't the file date already on the previous

1 screen?

2 A I would not collect it until I looked at the
3 details of the case.

4 Q So what other information is in that detail
5 screen?

6 A I don't recall.

7 Q Was there an amount, if there was a
8 nonpayment of rent claim?

9 A Can you repeat that?

10 Q Did the detail screen contain an amount, a
11 dollar figure?

12 A Occasionally.

13 Q Did you record that? Were you required to
14 record that?

15 A If it was available.

16 Q So that was part of the job, to record that?
17 It was a requirement?

18 A If it was available.

19 Q Obviously, if it wasn't, you couldn't do it?

20 A Correct.

21 Q Okay. Any other information that was
22 recorded from the screen that was part of the
23 requirements?

24 A Not that I recall.

25 Q And if there was a disposition, did you also

1 A Landlord-tenant.

2 Q I'm talking about the methodology now as
3 opposed to the content. Is it manual data acquisition?
4 Is that a way to describe it?

5 A Yes.

6 Q Since you're actually sitting down and
7 manually recording?

8 A Yes.

9 Q And what was the information recorded onto?
10 Was it written somewhere? Was it entered into some sort
11 of an electronic device or something else?

12 A Entered into a computer.

13 Q What kind of computer?

14 MR. ST. GEORGE: Object to form.

15 BY MR. FISHMAN:

16 Q Well, not the brand.

17 MR. ST. GEORGE: That's just what I'm saying.

18 BY MR. FISHMAN:

19 Q I don't care about the brand.

20 A A laptop.

21 Q Was that a laptop supplied by Corelogic?

22 A Yes.

23 Q Did they ever use tablets or iPads or any
24 other kind of devices or just laptops?

25 A Just laptops.

1 Q So it was manually keyed into the laptop?

2 A Yes.

3 Q Were there screenshots taken as well? Was
4 that part of the process?

5 A No.

6 Q How about printouts with anything on the
7 screen?

8 A During the collection process?

9 Q Yes.

10 A No.

11 Q Are you aware of whether or not it's possible
12 to print out information from the public access computer
13 at the courthouse?

14 A No.

15 Q You're not aware or you can't do it?

16 A To my knowledge, it cannot be done.

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1 A Correct.

2 Q Not at the same time, but those two people?

3 A Yes.

4 Q Were they also solely responsible for New
5 York City or other places, too?

6 A Other places.

7 Q Okay. And were you solely responsible for
8 supervising the researchers in New York City for L&T
9 records?

10 MR. ST. GEORGE: Object to form.

11 THE WITNESS: Can you clarify?

12 BY MR. FISHMAN:

13 Q Well, was anybody else responsible for
14 supervising the researchers for housing court records?

15 MR. ST. GEORGE: I think you need a date on
16 your question.

17 BY MR. FISHMAN:

18 Q During the period you were doing it, which I
19 believe you said was from '14 to '18, correct?

20 MR. ST. GEORGE: The date she was a
21 supervisor.

22 BY MR. FISHMAN:

23 Q Yes.

24 A Some of the researchers reported to somebody
25 else.

1 Q About housing court records?

2 A No. I was the sole person responsible for
3 housing records.

4 Q That was my question. Were you the sole
5 person responsible for supervising all the researchers
6 collecting housing court records? I believe you said
7 yes.

8 A Yes.

9 Q That was for about a four-year period, right?

10 A Yes.

11 Q And so during that entire four-year period,
12 you would know, would you not, whether or not the 30-day
13 backlog expectation was being met or not, wouldn't you?

14 A Yes.

15 Q And you knew that each month, right?

16 A During my supervisor term, yes.

17 Q Which was that four-year period?

18 A Yes.

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19 Q Is there any other court system in the
20 country that has the same volume as New York?
21 A I don't know.
22 Q You were involved in the collection of
23 landlord-tenant records in other parts of the country,
24 right?
25 A Yes.

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12 Q Is currency an important criteria?

13 MR. ST. GEORGE: Object to form.

14 BY MR. FISHMAN:

15 Q For Corelogic?

16 MR. ST. GEORGE: Same objection.

17 THE WITNESS: Yes.

18 BY MR. FISHMAN:

19 Q Because if there's a long gap between the
20 collection of the filing of a case and the disposition
21 of a case, that could affect the accuracy of Corelogic's
22 report, correct?

23 MR. ST. GEORGE: Object to form.

24 BY MR. FISHMAN:

25 Q If there's a long gap, a lengthy gap, between

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DEPOSITION OF: Autumn DeLoatche

DATE OF DEPOSITION: November 30, 2018

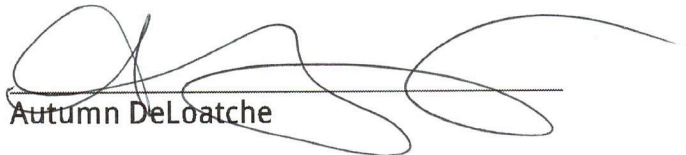
NAME OF CASE: *Claudinne Feliciano v. CoreLogic SafeRent, LLC, a/k/a CoreLogic Rental Property Solutions, LLC*

CASE NUMBER: 17-cv-05507 (AKH)

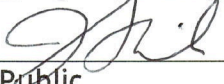
ERRATA SHEET

I, the undersigned, Autumn DeLoatche, do hereby certify that I have read the transcript of my testimony, and that to the best of my knowledge, said deposition is true and accurate, with the exception of the following corrections listed below:

Page(s)/Line(s)	Reason for Change:	Change:	To:
63:3	Transcription error	Indicate	Implicate
77:13	Transcription error	Bhava Lad	Bhavna Lad
102:2-4	Transcription error	updated	updating
110:4	Transcription error	ran	run
222:13-14	Transcription error	Niene Kayanic	Naeem Kayani
227:12	Transcription error	TCF	TCS


Autumn DeLoatche

Sworn to and subscribed before me
this 18th day of January, 2019.



Notary Public
My commission expires: 1/4/21

